

November 7, 2013

BY ECF

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Offshore Exploration and Prod. LLC v. Morgan Stanley Private Bank, N.A., et al., Case No. 13-civ-3537 (JGK)

Dear Judge Koeltl:

We represent Defendants Korea National Oil Corporation and Ecopetrol S.A., and we write to request an adjournment of the oral argument currently scheduled for Friday, November 15, 2013 at 11:00 a.m. in Courtroom 12B before Your Honor. Counsel for the Defendants have a variety of scheduling conflicts on November 15, including a longstanding family commitment of counsel for EcoPetrol in rural Virginia.

We ask that the Court reschedule the oral argument to Friday, November 22, 2013, if the Court is available to hear argument that day. No previous requests for adjournment have been made, no other scheduled dates would be affected by an adjournment, and this request is made more than 48 hours prior to the scheduled appearance.

We have contacted counsel for Plaintiff about modifying the date for oral argument, and counsel has indicated that Plaintiff has no objection to moving the hearing to Friday, November 22, 2013. Counsel for Plaintiff also indicated, however, that Plaintiff may have an objection if the Court is unavailable on the 22nd and would need to postpone the hearing to a later date.

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Respectfully,

s/ Mark P. Gimbel
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Corporation*

s/ William H. Knull, III*
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Counsel for Defendant Ecopetrol S.A.

cc: All counsel of record (by ECF)

* Consent for signature obtained.